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8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF CALIFORNIA
10 SACRAMENTO DIVISION

11 GABRIEL BALANAG) Case No: 10-20425
12 AIDA BALANAG) MOTION TO
13 Debtor.) COMPEL ABANDONMENT OF ASSETS
14) OF THE ESTATE VEHICLES
15) TJW-2
16) DATE: JUNE 23, 2010
17) TIME: 9:30 AM
18) DEPT C
19) COURTROOM 35
20) JUDGE CHRISTOPHER M. KLEIN
21) 11USC554

22 DEBTOR'S MOTION TO COMPEL TRUSTEE TO ABANDON ASSETS OF THE ESTATE,

23 TO WIT: VEHICLES INCLUDING :

24 2003 MAZDA PROTÉGÉ

25 2005 MAZDA 3

1997 FORD F-150

20 2004 INFINITY FX35

21 Debtors hereby move the Court for an order to compel the trustee to abandon the assets of
22 property of the estate, to wit: the 2003 Mazda Protégé, 2005 Mazda 3 1997 Ford F-150, 2004
23 Infinity FX35, hereinafter referred to as Vehicles.

24 The basis of the motion is that the Vehicles are declared by the debtors as Exempt under
25 CCP703.140(b)(5) in the petition on file with this Court.

1 A portion of the 2004 Infinity , \$4,700.,is actually not exempt, however, the debtor and the
2 trustee have stipulated to a payment to offset that amount.

3 Debtors believe that, in addition to the exemptions claimed, the assets constitute no value to the
4 estate, and may constitute a liability to the estate.

5 This motion is filed in good faith. Debtors have reason to believe that the trustee concurs in this
6 motion.

7 WHEREFORE:

8 Debtors pray the Court compel the trustee to abandon the estate's interest in the said Vehicles.
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12 Dated this20th DAY OF May 2010
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14 /s/ Timothy J. Walsh
15 TIMOTHY J. WALSH
16 ATTORNEY AT LAW
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